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September 2, 2008

**To: Environmental Protection Agency**

**From: National Grape Cooperative**

**Re: EPA Notice on National Marine Fisheries Services Opinion  
on Chlorpyrifos, Diazinon, and Malathion (EPA-HQ-OPP-2008-0654)**

National Grape Cooperative is offering this letter in support of the current EPA registration regarding the continued use of Chlorpyrifos, Diazinon, and Malathion. We do not agree with the opinion of the National Marine Fisheries Services (NMFS) regarding the impact of these materials on certain endangered species. This draft opinion is the result of the settlement of a lawsuit and does little to protect the identified salmon species.

National Grape is an agricultural cooperative whose members adhere to strict pesticide use guidelines. Our members are well aware of setback requirements for use of the above listed pesticides. They are careful to limit potential runoff and they adhere to other EPA established practices. This, we believe, minimizes potential risks associated with the use of these pesticides near the salmon habitats in the Pacific Northwest.

Our members utilize Integrated Pest Management (IPM) techniques that limit pesticide use to minimum required amounts and only when necessary. It is very important that these products remain available because they are important tools used to protect the grape crop from damaging pests. Without these tools, pests would cause significant damage and threaten the economic viability of grape producers in Washington State.

EPA's initial ruling stated that the above listed pesticides would have no effect, or may affect but not likely adversely affect the listed endangered salmon species. We support that ruling.

The biological opinion of NMFS neglects current assessments given them that represent the best available scientific data. NMFS used an invalidated, unpublished, non-peer-reviewed population model as the basis for its predicted population effects. NMFS's opinion disregards what EPA already established as lower use rates, fewer use sites and setbacks as well as other restrictions on these products.

We support the current registration, availability and use of chlorpyrifos, diazinon, and malathion and oppose the non-science based opinion of NMFS.

Sincerely,

Thomas G. Davenport  
Director of Viticulture